Annual 47 CFR § 64.2009(e) CPNI Certification Template

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: March 5, 2018

2. Name of company(s) covered by this certification: Coon Rapids Municipal Utilities

3. Form 499 Filer ID: 820758

4. Name of signatory: Kari M. Woodard

5. Title of signatory: Director of Finance & Accounting

6. Certification:

I, Kari M. Woodard, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI. [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Kari M. Woodard

Attachments:

Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)



123 3rd Avenue South - P.O. Box 207 - Coon Rapids, IA 50058 TEL: 712.999.2225 FAX: 712.999.5148

URL: http://www.crmu.net EMAIL: info@crmu.net

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COON RAPIDS MUNICIPAL UTILITIES

Attachment: Accompanying Statement Explaining Company's Procedures

Coon Rapids Municipal Utilities has ensured compliance with CPNI rules throughout 2017 by doing the following:

- All employees were trained and certified on CPNI.
- A form was completed for all new customers to establish a password and back-up question.
- Employees authenticate every customer.
- Notification letters are sent within 48 hours if an account change has occurred.
- Update the CPNI file if targeted marketing pieces were used. However, Coon Rapids Municipal Utilities does not target market. Only mass marketing practices are used.

In 2017, there were no actions taken against data brokers, and Coon Rapids Municipal Utilities received no customer complaints concerning unauthorized release of CPNI.

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